

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION

UNITED STATES OF AMERICA,

v.

JIE ZHU,  
a/k/a James Zhu

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§

No. 4:20CR **17**  
Judge **MAZZANT**

**SEALED**

**FILED**

**JAN 31 2020**

Clerk, U.S. District Court  
Eastern District of Texas

**INFORMATION**

THE UNITED STATES ATTORNEY CHARGES:

**Count One**

Violation: 18 U.S.C. § 1832(a)(2) and  
(3) (Theft of Trade Secrets)

**GENERAL ALLEGATIONS**

At all times relevant to this Information:

**Defendant and Entities**

1. Defendant **JIE ZHU, also known as James Zhu**, was a citizen of the Peoples Republic of China and a U.S. Permanent Resident Alien, and was employed as a Research and Development Director at the Natural Polymer International Corporation (NPIC) at a NPIC production facility in Plano, Texas.
2. Natural Polymer International Corporation (NPIC), a corporation organized and operating in the United States and the Eastern District of Texas, was a domestic and international business engaged in the research, development, manufacturing and production of natural treat products for pets.

From on or about October 3 to October 9, 2017, in the Eastern District of Texas, and elsewhere, **JIE ZHU, also known as James Zhu**, defendant, with intent to convert a trade secret, that is related to or included in a product or service used in and intended for use in interstate and foreign commerce, to the economic benefit of anyone other than the owner thereof, and intending and knowing that the offense would injure NPIC, did knowingly, and without authorization, copy, duplicate, download, upload, alter, replicate, transmit, deliver, send, mail, communicate and convey; and did receive, and possess knowing it to have been stolen or appropriated, obtained, and converted without authorization, NPIC proprietary trade secrets, to wit: technical specifications, scientific, economic, and engineering information, including plans, compilations, program devices, formulas, designs, methods, techniques, processes, procedures, programs, and codes, tangible and intangible, regarding the production of a product known as Twistix Milk & Cheese Dental Chew Sticks.

In violations of 18 U.S.C. §§ 1832(a)(2) and (3).

**NOTICE OF INTENT TO SEEK CRIMINAL FORFEITURE**  
**(Pursuant to 18 U.S.C. §§ 1834 and 2323)**

As a result of the commission of the foregoing offense, the defendant shall forfeit to the United States, pursuant to 18 U.S.C. §§ 1834 and 2323, any and all property or constituting or derived from proceeds the defendant obtained directly or indirectly as a result of the foregoing offense.


Substitute assets

If any property subject to forfeiture as a result of any act or omission by the defendants (i) cannot be located upon the exercise of due diligence, (ii) has been transferred or sold to, or deposited with a third party, (iii) has been placed beyond the jurisdiction of the court, (iv) has been substantially diminished in value, or (v) has been commingled with other property which cannot be subdivided without difficulty, the defendant shall forfeit to the United States any other property of the defendant up to the value of the forfeitable property.

All pursuant to 18 U.S.C. §§ 1834 and 2323.

Respectfully submitted,

JOSEPH D. BROWN  
UNITED STATES ATTORNEY



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**NOTICE OF PENALTY**

**Count One**

Violation: 18 U.S.C. § 1832

Penalty: Imprisonment for a term of not more than ten years, a fine not to exceed \$250,000.00, or both; and supervised release of at least three years.

Special Assessment: \$100.00